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May 26, 2021

So ordered,
/s/ Alvin K. Hellerstein
Alvin K. Hellerstein
5/28/21

BY ECF

The Honorable Alvin K. Hellerstein
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Valencia Rocha et al., 21 Cr. 236 (AKH)

Dear Judge Hellerstein:

I represent Charles Burrill in the above-referenced matter, having been recently appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A on April 13, 2021.

I write to request a further extension until Monday, May 31, 2021 to file our motion to suppress, which was to be filed yesterday. Because of demands this week associated with an upcoming trial before the Honorable Paul A. Engelmayer on June 2, 2021, including pretrial hearings, we need a few more days to complete our motion to suppress. I contacted the Government this morning concerning this request and have not received a response.

Thank you for your consideration.

Respectfully submitted,

/s/

Anthony Cecutti